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**Spring Gun.**—Defendant so arranged a gun within his trunk that his landlady, inspired with curiosity, opening it, was killed by its discharge. Defendant was convicted of murder in the second degree; but, because of some legal technicality in the selection of the jury, his conviction was reversed. However, the Washington Supreme Court, in *State v. Marfaudille*, 92 Pacific Reporter, 939, remarked that a warning by accused to decedent would be no defense, unless her act was with intention to cause self-destruction, nor would a lack of intent to kill the particular person who fell a victim be any excuse.

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**Legitimization of Bastards.**—A man abandoned his wife and children in New York, married again without obtaining a divorce, eventually moved to Michigan, instituted divorce proceedings against his lawful wife by publication, notice of which she did not receive, was thereupon awarded a decree of divorce, and remarried the second wife by whom he had had two children. The remainder of an estate of which the father had been life tenant was to vest in his "lawful issue." By the Michigan law the intermarriage of parents legitimizes their offspring. The New York Court of Appeals in *Olmsted v. Olmsted*, 83 Northeastern Reporter, 569, held, as the Michigan court had never acquired jurisdiction of the person of the first wife, its decree of divorce was not a judgment which it bound to respect, and that the subsequent marriage was invalid, and did not legitimize the issue of the second wife.

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**Proximate Cause.**—Plaintiff had agreed to maintain fences about his premises along defendant's railroad track. A cow escaped through a defect in the fence, and was struck by defendant's engine. In *Southern Ry. Co. v. Dickens*, 45-Southern Reporter, 215, an action for the death of the animal, defendant contended that the failure to keep up the fence proximately contributed to plaintiff's damage, which contention the Supreme Court of Alabama refused to sustain.

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**Laws Establishing Commission to Regulate Gas.**—In the case of *Trustees of Saratoga Springs v. Saratoga Gas, E. L. & P. Co.*, 83 Northeastern Reporter, 693, the validity of the New York statute providing for the appointment of a commission to determine the maximum price to be charged for service by electric and gas companies was attacked. Several constitutional grounds were set up, one of which was held to be meritorious. The statute provided that only municipal officers, customers, or purchasers of gas or electricity were authorized to make complaint, no such right being given to the corporation. The New York Court of Appeals held this to be in violation of the 14th amendment to the federal Constitution, providing that no state shall deny to any person within its jurisdiction the equal protection of the laws.